

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

IN RE NEW ENGLAND COMPOUNDING
PHARMACY, INC. PRODUCTS LIABILITY
LITIGATION

THIS DOCUMENT RELATES TO:

All Suits Against the Saint Thomas Entities

MDL No. 2419
Dkt. No 1:13-md-2419 (RWZ)

**THE SAINT THOMAS ENTITIES’
MOTION TO AMEND THE SCHEDULE FOR BELLWETHER DISCOVERY**

Pursuant to Federal Rules of Civil Procedure 16 and 26, the Saint Thomas Entities¹ hereby file this motion to amend the schedule for bellwether discovery. Despite diligent efforts by all counsel, the current deadlines for case-specific discovery and common issue expert discovery have become unworkable for the reasons described in the accompanying memorandum. Thus, the Saint Thomas Entities move that the Court extend the current schedule so that the parties can fully and properly develop the bellwether cases for meaningful trials.

WHEREFORE, the Saint Thomas Entities respectfully request the Court enter an order adopting their case-specific discovery schedule as proposed in the accompanying memorandum.

¹ Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

Dated: December 30, 2015

SAINT THOMAS WEST HOSPITAL, SAINT
THOMAS HEALTH, and SAINT THOMAS
NETWORK

By their attorneys,

/s/ Sarah P. Kelly
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LOCAL RULE 7.1 CERTIFICATE OF CONFERENCE

I certify that counsel for the Saint Thomas Entities emailed representatives of the PSC about the issues raised in this motion. At the time of filing, there was no response.

/s/ Sarah P. Kelly
Sarah P. Kelly

CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 30th day of December, 2015.

/s/ Sarah P. Kelly
Sarah P. Kelly

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